

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

**WSOU INVESTMENTS, LLC D/B/A
BRAZOS LICENSING AND
DEVELOPMENT,**
Plaintiff,

v.

**CANON INC. AND CANON U.S.A.,
INC.**
Defendants.

CANON INC.,
Third-Party Plaintiff,

v.
NXP USA, INC.,
Third-Party Defendant.

CIVIL ACTION 6:20-cv-00980-ADA-DTG

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JOINT MOTION TO STAY ALL DEADLINES

On August 19, 2022, Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development (“Brazos”) and Defendants Canon Inc. and Canon U.S.A., Inc. (“Canon”) (collectively, “Parties”) filed a Joint Notice of Settlement and Motion to Stay All Deadlines. ECF No. 187. And on August 22, 2022, the Court granted the Parties’ motion and stayed until September 19, 2022. ECF No. 188.

A settlement in principle has been reached to resolve all matters in controversy asserted by Brazos's Complaint (Dkt. 70).¹ Accordingly, the Parties request a further stay of all deadlines to allow for negotiations to be finalized and the Parties to submit a motion to dismiss all claims at issue.

The Parties expect to file dismissal papers within thirty (30) days.

In light of this settlement and impending dismissal, the Parties respectfully request the Court stay all impending deadlines until October 19, 2022.

¹ The settlement in principle also resolves the additional proposed claims that were the subject of Brazos's pending motion to amend seeking, *inter alia*, leave to file a third amended complaint. ECF No. 176.

Dated: September 19, 2022

Respectfully Submitted

/s/ Jonathan K. Waldrop

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CERTIFICATE OF SERVICE

A true and correct copy of the foregoing instrument was served or delivered electronically to all counsel of record, on this 19th day of September, 2022, via the Court's CM/ECF system.

/s/ Jonathan K. Waldrop